

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

STATE DEFENDANTS' MOTION FOR EXTENSION OF TIME

This Court requested the parties file today any necessary supplemental briefing regarding the parties' discovery conference with the Court. *See* [Doc. 1099, Tr. at 59:10–21]. Today, the Plaintiffs jointly requested and received an extension of time to 3:00 PM on Wednesday, June 9, 2021, to file their supplemental briefing. [Docs. 1100 and 1101].

In the interests of fairness and efficiency, State Defendants request a concomitant extension of time for the same period. As the Plaintiffs' explained, this "Court noted significant issues" with the requests, [Doc. 1100], and State Defendants wish to avoid a scenario in which the Plaintiffs are essentially afforded an opportunity for responsive briefing to which the State Defendants will be unable to reply.

A proposed order granting this extension is attached.

Respectfully submitted this 7th day of June 2021.

/s/ Carey A. Miller

Vincent R. Russo

Georgia Bar No. 242628

vrusso@robbinsfirm.com

Joshua B. Belinfante

Georgia Bar No. 047399

jbelinfante@robbinsfirm.com

Carey A. Miller

Georgia Bar No. 976240

cmiller@robbinsfirm.com

Alexander F. Denton

Georgia Bar No. 660632

adenton@robbinsfirm.com

Robbins Ross Alloy Belinfante Littlefield LLC

500 14th Street, N.W.

Atlanta, Georgia 30318

Telephone: (678) 701-9381

Facsimile: (404) 856-3255

Bryan P. Tyson

Georgia Bar No. 515411

btyson@taylorenghish.com

Jonathan D. Crumly

Georgia Bar No. 199466

jcrumly@taylorenghish.com

James A. Balli

Georgia Bar No. 035828

jballi@taylorenghish.com

R. Dal Burton

Georgia Bar No. 097890

dburton@taylorenghish.com

Diane F. LaRoss

Georgia Bar No. 430830

dlaross@taylorenghish.com

Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenghish.com
Loree Anne Paradise
Georgia Bar No. 382202
lparadise@taylorenghish.com
TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: 678-336-7249

Counsel for State Defendants

L.R. 7.1(D) CERTIFICATION

I certify that this Motion for Extension of Time has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

/s/ Carey A. Miller
Carey A. Miller